

Judge Karen Overstreet  
Chapter 11  
April 9, 2010; 9:30 a.m.  
Reply Date: April 2, 2010

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:	)	
	)	Bankruptcy No. 09-13244
Vladimir and Ludmila Gurevich	)	
	)	MOTION TO CLOSE CASE AND
Debtors,	)	FINAL ATTORNEY FEES
	)	(Combined with Notice of Hearing
	)	and Certificate of Mailing)

COMES NOW Larry B. Feinstein of Vortman & Feinstein, attorney for the Debtors, Vladimir and Ludmila Gurevich, and applies to the Court for approval to close this case, and final attorneys' fees and costs pursuant to the provisions of 11 U.S.C. § 330 as follows:

1. A 2<sup>nd</sup> Amended Chapter 11 Plan was confirmed on February 17, 2010. To the best of counsel's knowledge, all distributions of property of the estate as required under the Plan of Reorganization are being made.

2. Payments to creditors as provided for under the Plan of Reorganization confirmed by this Court have commenced.

3. No claims or interest are still disputed or not dealt with under the Plan of Reorganization.

Further, counsel for the debtor in possession requests an order for final fees and compensation as follows:

4. This is Vortman & Feinstein's first and final fee request in this proceeding for services rendered during the period of April 5, 2009 through March 11, 2010.

5. This bankruptcy proceeding commenced by the filing of a voluntary Chapter 11 petition on April 5, 2009.

6. An order was entered authorizing employment of Vortman & Feinstein as

MOTION TO CLOSE CASE AND  
FINAL ATTORNEYS FEES  
(Combined with Notice of Hearing and Certificate  
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Vortman & Feinstein  
500 Union Street, Suite 500  
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206-223-9595  
Fax: 206-386-5355

1 attorneys for the Debtor on April 28, 2009.

2 7. Attached hereto and made a part hereof are our billings and time slips  
3 showing the services which we have rendered to date for the Debtor by Vortman &  
4 Feinstein. The hourly rate for Mr. Feinstein is \$350.00. Those services included routine  
5 matters required under Chapter 11, including attending hearings before the court; prepare  
6 motions and orders on matters regarding the debtors home and office building;  
7 negotiations with the creditors and US Trustee on the Plan and payments; settlement of  
8 various mortgage debt on four properties; draft and finalize debtor's disclosure statement  
9 and plan of reorganization; preparation of notices and ballots for confirmation; attend  
10 confirmation hearings; and preparation of fee request pleadings.

11 8. To date, Vortman & Feinstein have fees totaling in the amount of \$6,755.00  
12 as set forth on the attached billings for this proceeding. Vortman & Feinstein is requesting  
13 an additional one hours (\$350.00) to complete the confirmation process including  
14 finalizing the estate; prepare a final decree, and other matters necessary to complete the  
15 Chapter 11. Therefore, it is requested that final fees be allowed for \$7,105.00. We have  
16 received pre-petition retainer and/or payments into trust totaling \$5,635.00. After  
17 application of fund in trust, the balance of \$1,570 will be paid under the Plan as an  
18 administration cost.

19 9. Further, upon completion of the payments required under the Plan, the  
20 debtor may file with the Court and serve copies on the US Trustee and on all creditors  
21 having allowed claims in these proceedings, of a Motion and Order of Discharge and  
22 Declaration of Completion containing the required elements and findings under  
23 §1141(d)(5)(A) or (B), and reopen this matter without filing fee for entry of an Order  
24 granting the debtors' discharge.

25 WHEREFORE, Vortman & Feinstein respectfully request that this Court enter an  
26 order to close the case, and enter an order authorizing allowance of final attorneys' fees  
27

28 MOTION TO CLOSE CASE AND  
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1 and costs as follows:

2 Awarding to Vortman & Feinstein final compensation for professional services  
3 rendered throughout this bankruptcy proceeding in the amount of \$6,755.00, plus an  
4 additional \$350.00 for services to close this estate, totaling \$7,105.00.

5 DATED this 11<sup>th</sup> day of March, 2010.

6 /s/ Larry B. Feinstein

7 Larry B. Feinstein, WSBA #6074  
8 Attorney for Debtor

9  
10 **NOTICE OF HEARING**

11 PLEASE TAKE NOTICE that an issue of law in this case will be heard on the  
12 date below and the clerk is directed to note this issue on the appropriate calendar.

13 Calendar Date: April 9, 2010; 9:30 a.m.

14 Reply Date: April 2, 2010

15 Day of Week: Friday

16 Nature of Motion: MOTION TO CLOSE CASE AND ATTORNEYS FEES

17 This motion will be heard before the Honorable Karen Overstreet in the United  
18 States Bankruptcy Court, United States Courthouse, 700 Stewart Street, Rm 7206, Seattle,  
19 WA 98101 on the above date. Unless a creditor or other party in interest objects and files  
20 a response or objection by the response date above, the court may enter an order without  
21 further notice or hearing. Copies of this Motion have been mailed on this date to the  
22 following:

23 To: See attached mailing matrix

24 Dated this 11<sup>th</sup> day of March, 2010.

25 /s/ Larry B Feinstein

26 Larry B. Feinstein WSBA # 6074  
27 Attorney for Debtor

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